

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No.: 1:23-cv-00423-WO-JLW

TIMIA CHAPLIN, SARAH FIELDS,
SAYELINE NUNEZ, THOMAS HAYWARD,
KEVIN SPRUILL, ROTESHA MCNEIL,
QIANA ROBERTSON, YOUSEF JALLAL,
MESSIEJAH BRADLEY, DENNIS KEITH
LASSITER, PAULINO CASTELLANOS,
ROBERT LEWIS AND ALLEN SIFFORD,
on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

GARRY L. MCFADDEN, officially as
the Sheriff of Mecklenburg
County; JOHN DOE SURETY, as
Surety for the Sheriff of
Mecklenburg County; TYLER
TECHNOLOGIES, INC.,

Defendants.

DEFENDANT TYLER TECHNOLOGIES
INC.'S ANSWER TO SECOND
AMENDED COMPLAINT AND
AFFIRMATIVE DEFENSES

(JURY TRIAL DEMANDED)

In the Second Amended Complaint (the "Complaint"), Plaintiffs point to a small handful of matters out of tens of thousands that were migrated to North Carolina's eCourts system to try and claim there are systemic problems with the eCourts software. Plaintiffs are wrong, and Tyler Technologies denies the allegations against it.

The North Carolina eCourts software works as designed. As a software vendor, Tyler Technologies licenses and implements the software, it does not operate it. Tyler Technologies does not generate or own the data entered into, stored in, or processed through the North Carolina eCourts software. Those responsibilities fall to the software's end-users. Tyler – again, a software vendor – also does not arrest or detain individuals. That falls to state law enforcement officials. Plaintiffs have no viable legal claim against Tyler Technologies.

Tyler Technologies responds to the Complaint's allegations as follows:

I. NATURE OF THE CASE

1. Paragraph 1 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies denies the allegations in Paragraph 1.
2. Tyler Technologies admits on information and belief that there is support for modernizing North Carolina's court system. The remainder of Paragraph 2 states a legal conclusion, to which no response is required. To

the extent a response is required, Tyler Technologies denies the allegations in Paragraph 2.

3. Tyler Technologies denies that the launch of eCourts has caused people to spend days or weeks longer than necessary in jail. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the remaining allegations in Paragraph 3, and therefore, denies the same.
4. Paragraph 4 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies denies the allegations in Paragraph 4.
5. Paragraph 5 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies denies the allegations in Paragraph 5.
6. Tyler Technologies admits that eCourts is expected to be fully implemented in all counties in North Carolina. Except as expressly admitted herein, Tyler Technologies denies the allegations in Paragraph 6.

II. JURISDICTION

7. Paragraph 7 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies does not contest subject matter jurisdiction at this time.

8. Paragraph 8 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies does not contest this Court's supplemental jurisdiction at this time.

9. Paragraph 9 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies does not contest subject matter jurisdiction at this time.

10. Paragraph 10 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies does not contest personal jurisdiction at this time.

III. VENUE

11. Paragraph 11 states a legal conclusion, to which no response is required. To the extent a response is

required, Tyler Technologies does not contest venue at this time.

IV. Parties

12. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 12, and therefore, denies the same.

13. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 13, and therefore, denies the same.

14. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 14, and therefore, denies the same.

15. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 15, and therefore, denies the same.

16. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 16, and therefore, denies the same.

17. Paragraph 17 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies is without knowledge

sufficient to form a belief as to the truth of the allegations in Paragraph 17, and therefore, denies the same.

18. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 18, and therefore, denies the same.

19. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 19, and therefore, denies the same.

20. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 20, and therefore, denies the same.

21. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 21, and therefore, denies the same.

22. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 22, and therefore, denies the same.

23. Paragraph 23 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies is without knowledge

sufficient to form a belief as to the truth of the allegations in Paragraph 23, and therefore, denies the same.

24. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 24, and therefore, denies the same.

25. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 25, and therefore, denies the same.

26. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 26, and therefore, denies the same.

27. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 27, and therefore, denies the same.

28. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 28, and therefore, denies the same.

29. Paragraph 29 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies is without knowledge

sufficient to form a belief as to the truth of the allegations in Paragraph 29, and therefore, denies the same.

30. Paragraph 30 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 30, and therefore, denies the same.

31. Paragraph 31 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies admits that The Ohio Casualty Insurance Company was named as a defendant in this lawsuit. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the remaining allegations in Paragraph 31, and therefore, denies the same. Except as expressly admitted herein, Tyler Technologies denies the allegations of Paragraph 31.

32. Admitted.

33. Admitted on information and belief that Ryan Boyce is the Executive Director of the NCAOC. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the remaining allegations in Paragraph 33, and therefore, denies the same.

34. Admitted on information and belief that Brad Fowler is employed by the NCAOC. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the remaining allegations in Paragraph 33, and therefore, denies the same.

35. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 35, and therefore, denies the same.

36. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 36, and therefore, denies the same.

37. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 37, and therefore, denies the same.

38. Paragraph 38 states a legal conclusion, to which no response is required. To the extent a response is

required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 38, and therefore, denies the same.

39. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 39, and therefore, denies the same.

40. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 40, and therefore, denies the same.

41. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 41, and therefore, denies the same.

42. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 42, and therefore, denies the same.

43. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 43, and therefore, denies the same.

44. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 44, and therefore, denies the same.

45. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 45, and therefore, denies the same.

46. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 46, and therefore, denies the same.

47. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 47, and therefore, denies the same.

48. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 48, and therefore, denies the same.

49. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 49, and therefore, denies the same.

50. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 50, and therefore, denies the same.

51. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 51, and therefore, denies the same.

V. FACTUAL BACKGROUND

52. Paragraph 52 states an opinion, to which no response is required.

53. Paragraph 53 purports to quote an article, which article speaks for itself. Tyler Technologies is without knowledge sufficient to form a belief as to any remaining allegations in Paragraph 53, and therefore, denies the same.

54. Paragraph 54 purports to quote an article, which article speaks for itself. Tyler Technologies is without knowledge sufficient to form a belief as to any remaining allegations in Paragraph 54, and therefore, denies the same.

55. Paragraph 55 purports to quote an article, which article speaks for itself. Tyler Technologies admits that many federal courts use digital filing and recordkeeping. Tyler Technologies is without knowledge sufficient to form a belief as to any remaining

allegations in Paragraph 55, and therefore, denies the same.

56. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 56. To the extent a response is required, admitted on information and belief.

57. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 57. To the extent a response is required, admitted on information and belief.

58. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 58. To the extent a response is required, admitted on information and belief.

59. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 59. To the extent a response is required, admitted on information and belief.

60. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in

Paragraph 60. To the extent a response is required, admitted on information and belief.

61. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 61. To the extent a response is required, admitted on information and belief.

62. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 62. To the extent a response is required, admitted on information and belief.

63. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 63. To the extent a response is required, admitted on information and belief.

64. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 64. To the extent a response is required, admitted on information and belief.

65. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in

Paragraph 65. To the extent a response is required, admitted on information and belief.

66. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 66. To the extent a response is required, admitted on information and belief.

67. Tyler Technologies admits that it was invited to give a demonstration to the Selection Committee in December 2018. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the remaining allegations in Paragraph 67. To the extent a response is required, admitted on information and belief.

68. Upon information and belief, admitted.

69. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 69, and therefore, denies the same.

70. Tyler Technologies admits that on June 7, 2019, it entered into a contract with the NCAOC, which contract speaks for itself. Except as expressly admitted

herein, Tyler Technologies denies the allegations in Paragraph 70.

71. Paragraph 71 refers to a contractual document, which document speaks for itself. Tyler Technologies denies the characterization of the contract contained in Paragraph 71.

72. Paragraph 72 refers to a contractual document, which document speaks for itself. Tyler Technologies denies the characterization of the contract contained in Paragraph 72.

73. Paragraph 73 refers to a contractual document, which document speaks for itself. Tyler Technologies denies the characterization of the contract contained in Paragraph 73.

74. Tyler Technologies admits that eWarrants was implemented statewide in July 2022, prior to the first go-lives of Odyssey. Tyler Technologies denies the characterization of the article the Complaint purports to quote in Paragraph 74, which article speaks for itself. Except as expressly admitted herein, Tyler Technologies denies the allegations in Paragraph 74.

75. Admitted, on information and belief.
76. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 76. To the extent a response is required, admitted on information and belief.
77. Admitted that eCourts launched in four pilot counties on or about February 2023. Except as expressly admitted herein, Tyler Technologies denies the allegations in Paragraph 77.
78. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 78, and therefore, denies the same.
79. Paragraph 79 references an article and email, which documents speak for themselves. Tyler Technologies denies the characterization of those documents. Except as expressly admitted herein, Tyler Technologies denies the allegations in Paragraph 79.
80. Paragraph 80 references an article, which document speaks for itself. Tyler Technologies denies the characterization of that document. Except as expressly

admitted herein, Tyler Technologies denies the allegations in Paragraph 80.

81. Tyler Technologies denies the allegations in Paragraph 81.

82. Paragraph 82 references a document. Tyler Technologies denies the characterization of that document, which speaks for itself. Except as expressly admitted herein, Tyler Technologies denies the allegations in Paragraph 82.

83. Paragraph 83 references a document. Tyler Technologies denies the characterization of that document, which speaks for itself. Except as expressly admitted herein, Tyler Technologies denies the allegations in Paragraph 83.

84. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 84, and therefore, denies the same.

85. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 85, and therefore, denies the same.

86. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 86, and therefore, denies the same.

87. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 87, and therefore, denies the same.

88. Paragraph 88 references a document. Tyler Technologies denies the characterization of that document, which speaks for itself. Except as expressly admitted herein, Tyler Technologies denies the allegations in Paragraph 88.

89. Admitted on information and belief.

90. Tyler Technologies denies the allegations in Paragraph 90.

91. Paragraph 91 references a document. Tyler Technologies denies the characterization of that document, which speaks for itself. Except as expressly admitted herein, Tyler Technologies denies the allegations in Paragraph 91.

92. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in

Paragraph 92 concerning the time for a detainee to be released after their conditions of release were satisfied in Mecklenburg County before or after the go-live date, and therefore, denies the same. Tyler Technologies denies the remaining allegations in Paragraph 92.

93. Tyler Technologies denies the allegations in Paragraph 93.

94. Tyler Technologies denies the allegations in Paragraph 94.

95. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 95, and therefore, denies the same. Tyler Technologies denies that the alleged actions resulted from any problems with Tyler Technologies' software.

96. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 96, and therefore, denies the same. Tyler Technologies denies that the alleged actions resulted from any problems with Tyler Technologies' software.

97. Paragraph 97 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies notes that Paragraph 97 references certain articles and litigation pleadings. Tyler Technologies denies the characterization of those documents, which speak for themselves. Except as expressly admitted herein, Tyler Technologies denies the allegations in Paragraph 97.

98. Paragraph 98 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies denies the allegations in Paragraph 98.

99. Tyler Technologies denies the allegations in Paragraph 99.

100. Tyler Technologies denies the allegations in Paragraph 100.

101. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 101, and therefore, denies the same.

102. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 102, and therefore, denies the same.

103. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 103, and therefore, denies the same.

104. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 104, and therefore, denies the same.

105. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 105, and therefore, denies the same.

106. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 106, and therefore, denies the same.

107. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 107, and therefore, denies the same.

108. Tyler Technologies denies the allegations in Paragraph 108.

109. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 109, and therefore, denies the same.

110. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 110, and therefore, denies the same.

111. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 111, and therefore, denies the same.

112. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 112, and therefore, denies the same.

113. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 113, and therefore, denies the same.

114. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 114, and therefore, denies the same.

115. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 115, and therefore, denies the same.

116. Tyler Technologies denies the allegations in Paragraph 116.

117. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 117, and therefore, denies the same.

118. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 118, and therefore, denies the same.

119. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 119, and therefore, denies the same.

120. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 120, and therefore, denies the same.

121. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 121, and therefore, denies the same.

122. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 122, and therefore, denies the same.

123. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 123, and therefore, denies the same.

124. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 124, and therefore, denies the same.

125. Tyler Technologies denies the allegations in Paragraph 125.

126. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 126, and therefore, denies the same.

127. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 127, and therefore, denies the same.

128. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 128, and therefore, denies the same.

129. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 129, and therefore, denies the same.

130. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 130, and therefore, denies the same.

131. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 131, and therefore, denies the same.

132. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 132, and therefore, denies the same.

133. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 133, and therefore, denies the same.

134. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 134, and therefore, denies the same.

135. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 135, and therefore, denies the same.

136. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 136, and therefore, denies the same.

137. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 137, and therefore, denies the same.

138. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 138, and therefore, denies the same.

139. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 139, and therefore, denies the same.

140. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 140, and therefore, denies the same.

141. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 141, and therefore, denies the same.

142. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 142, and therefore, denies the same.

143. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 143, and therefore, denies the same.

144. Tyler Technologies denies that Plaintiff Timia Chaplin was arrested because of any problem with Tyler Technologies' software. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the remaining allegations in Paragraph 144, and therefore, denies the same.

145. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 145, and therefore, denies the same.

146. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 146, and therefore, denies the same.

147. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 147, and therefore, denies the same.

148. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 148, and therefore, denies the same.

149. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 149, and therefore, denies the same.

150. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 150, and therefore, denies the same.

151. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 151, and therefore, denies the same.

152. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 152, and therefore, denies the same.

153. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 153, and therefore, denies the same.

154. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 154, and therefore, denies the same.

155. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 155, and therefore, denies the same.

156. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 156, and therefore, denies the same.

157. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 157, and therefore, denies the same.

158. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 158, and therefore, denies the same.

159. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 159, and therefore, denies the same.

160. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 160, and therefore, denies the same.

161. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 161, and therefore, denies the same.

162. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 162, and therefore, denies the same.

163. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 163, and therefore, denies the same.

164. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 164, and therefore, denies the same.

165. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 165, and therefore, denies the same.

166. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 166, and therefore, denies the same.

167. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 167, and therefore, denies the same.

168. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 168, and therefore, denies the same.

169. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 169, and therefore, denies the same.

170. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 170, and therefore, denies the same.

171. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 171, and therefore, denies the same.

172. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 172, and therefore, denies the same.

173. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 173, and therefore, denies the same.

174. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 174, and therefore, denies the same.

175. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 175, and therefore, denies the same.

176. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 176, and therefore, denies the same.

177. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 177, and therefore, denies the same.

178. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 178, and therefore, denies the same.

179. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 179, and therefore, denies the same.

180. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 180, and therefore, denies the same.

181. Tyler Technologies denies the allegations in Paragraph 181.

182. Tyler Technologies denies the allegations in Paragraph 182 that an arrest warrant was issued for Messiejah Bradley as a result of any problem with Tyler Technologies' software. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the remaining allegations in Paragraph 182, and therefore, denies the same.

183. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 183, and therefore, denies the same.

184. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 184, and therefore, denies the same.

185. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 185, and therefore, denies the same.

186. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 186, and therefore, denies the same.

187. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 187, and therefore, denies the same.

188. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 188, and therefore, denies the same.

189. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 189, and therefore, denies the same.

190. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 190, and therefore, denies the same.

191. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 191, and therefore, denies the same.

192. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 192, and therefore, denies the same.

193. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 193, and therefore, denies the same.

194. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 194, and therefore, denies the same.

195. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 195, and therefore, denies the same.

196. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 196, and therefore, denies the same.

197. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 197, and therefore, denies the same.

198. Tyler Technologies denies that any problem described in Paragraph 198 resulted from a problem with Tyler Technologies' software. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the remaining allegations in Paragraph 198, and therefore, denies the same.

199. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 199, and therefore, denies the same.

200. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 200, and therefore, denies the same.

201. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 201, and therefore, denies the same.

202. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 202, and therefore, denies the same.

203. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 203, and therefore, denies the same.

204. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 204, and therefore, denies the same.

205. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 205, and therefore, denies the same.

206. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 206, and therefore, denies the same.

207. Admitted on information and belief.

208. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 208, and therefore, denies the same.

209. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 209, and therefore, denies the same.

210. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 210, and therefore, denies the same.

211. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 211, and therefore, denies the same.

212. Paragraph 212 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies denies any allegations in Paragraph 212 directed towards Tyler Technologies.

213. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 213, and therefore, denies the same.

214. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 214, and therefore, denies the same.

215. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 215, and therefore, denies the same.

216. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 216, and therefore, denies the same.

217. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 217, and therefore, denies the same.

218. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 218, and therefore, denies the same.

219. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 219, and therefore, denies the same.

220. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 220, and therefore, denies the same.

221. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 221, and therefore, denies the same.

222. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 222, and therefore, denies the same.

223. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 223, and therefore, denies the same.

224. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 224, and therefore, denies the same.

225. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 225, and therefore, denies the same.

226. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 226, and therefore, denies the same.

227. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 227, and therefore, denies the same.

228. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 228, and therefore, denies the same.

VI. CLASS ACTION ALLEGATIONS

229. Tyler Technologies admits that Plaintiffs seek to bring this action on behalf of themselves and the purported classes. Except as expressly admitted herein, Tyler Technologies denies the allegations in Paragraph 229. Tyler Technologies expressly denies

that Plaintiffs are entitled to class certification or to proceed as a class.

230. Paragraph 230 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies denies the allegations in Paragraph 230.

231. Paragraph 231 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies denies the allegations in Paragraph 231. Tyler Technologies expressly denies that there are questions of fact and law common to each member of the purposed classes.

232. Paragraph 232 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies denies the allegations in Paragraph 232.

233. Paragraph 233 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the

allegations in Paragraph 233, and therefore, denies the same.

234. Paragraph 234 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies denies the allegations in Paragraph 234.

235. Paragraph 235 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies denies the allegations in Paragraph 235.

236. Paragraph 236 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies denies the allegations in Paragraph 236.

VII. CLAIMS AGAINST TYLER TECHNOLOGIES, INC.

**FIRST CLAIM FOR RELIEF
(Negligence Against Tyler Technologies, Inc.)**

237. Tyler Technologies realleges its responses to the preceding paragraphs and incorporates them herein by reference.

238. Tyler Technologies admits that Plaintiffs purport to bring claims on their own behalf and purportedly on behalf of proposed classes. Tyler Technologies denies that Plaintiffs are entitled to any relief or that Plaintiffs can proceed as a class. Except as expressly admitted herein, Tyler Technologies denies the allegations in Paragraph 238.

239. Paragraph 239 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies denies the allegations in Paragraph 239.

240. Paragraph 240 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies denies the allegations in Paragraph 240.

241. Paragraph 241 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies denies the allegations in Paragraph 241.

242. Paragraph 242 references a contract, which speaks for itself. Tyler Technologies denies the

characterization of the document. Except as expressly admitted, Tyler Technologies denies the allegations in Paragraph 242.

243. Paragraph 243 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies denies the allegations in Paragraph 243.

244. Paragraph 244 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies denies the allegations in Paragraph 244.

245. Paragraph 245 states a legal conclusion, to which no response is required. To the extent a response is required, Tyler Technologies denies the allegations in Paragraph 245.

246. Plaintiffs have abandoned the failure-to-warn theory set out in Paragraph 246, as noted by the Court, see ECF No. 116 at 59 & n.31, and thus no response is required. To the extent a response is required, Tyler Technologies denies the allegations in Paragraph 246.

VIII. CLAIMS AGAINST SHERIFF DEFENDANTS

**SECOND CLAIM FOR RELIEF
(Negligence Against All Sheriff Defendants)**

247. Tyler Technologies realleges its responses to the preceding paragraphs and incorporates them herein by reference.

248. Paragraph 248 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 248, and therefore, denies the same.

249. Paragraph 249 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 249, and therefore, denies the same.

250. Paragraph 250 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler

Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 250, and therefore, denies the same.

251. Paragraph 251 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 251, and therefore, denies the same.

252. Paragraph 252 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 252, and therefore, denies the same.

253. Paragraph 253 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 253, and therefore, denies the same.

254. Paragraph 254 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 254, and therefore, denies the same.

255. Paragraph 255 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 255, and therefore, denies the same.

256. Paragraph 256 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 256, and therefore, denies the same.

257. Paragraph 257 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler

Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 257, and therefore, denies the same.

**THIRD CLAIM FOR RELIEF
(Violation of 42 U.S.C. § 1983 and *Monell* Against Defendant
Sheriff McFadden)**

258. Tyler Technologies realleges its responses to the preceding paragraphs and incorporates them herein by reference.

259. Paragraph 259 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 259, and therefore, denies the same.

260. Paragraph 260 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 260, and therefore, denies the same.

261. Paragraph 261 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 261, and therefore, denies the same.

262. Paragraph 262 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 262, and therefore, denies the same.

263. Paragraph 263 does not make allegations against Tyler Technologies and also states a legal conclusion; thus, no response is required. To the extent a response is required, Tyler Technologies denies the allegations in Paragraph 263.

264. Paragraph 264 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a

belief as to the truth of the allegations in Paragraph 264, and therefore, denies the same.

265. Paragraph 265 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 265, and therefore, denies the same.

266. Paragraph 266 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 266, and therefore, denies the same.

267. Paragraph 267 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 267, and therefore, denies the same.

268. Paragraph 268 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 268, and therefore, denies the same.

269. Paragraph 269 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies specifically denies that there was an "integration issue" between eWarrants and Odyssey that resulted in the Plaintiffs' alleged injuries. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the remaining allegations in Paragraph 269, and therefore, denies the same.

270. Paragraph 270 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 270, and therefore, denies the same.

271. Paragraph 271 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 271, and therefore, denies the same.

272. Paragraph 272 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies specifically denies that 66 people were detained beyond the point that their conditions of release were satisfied as the result of an alleged technological defect in eCourts. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the remaining allegations in Paragraph 272, and therefore, denies the same.

273. Paragraph 273 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a

belief as to the truth of the allegations in Paragraph 273, and therefore, denies the same.

274. Paragraph 274 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 274, and therefore, denies the same.

275. Paragraph 275 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies specifically denies that "glitches or crashes" in any Tyler Technologies' system caused any allegedly unlawful detentions or overdetections. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the remaining allegations in Paragraph 275, and therefore, denies the same.

276. Paragraph 276 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a

belief as to the truth of the allegations in Paragraph 276, and therefore, denies the same.

277. Paragraph 277 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 277, and therefore, denies the same.

278. Paragraph 278 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 278, and therefore, denies the same.

279. Paragraph 279 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 279, and therefore, denies the same.

FOURTH CLAIM FOR RELIEF
(Violation of § 1983 and *Monell* Against Defendant Sheriff Rowe)

280. Tyler Technologies realleges its responses to the preceding paragraphs and incorporates them herein by reference.

281. Paragraph 281 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 281, and therefore, denies the same.

282. Paragraph 282 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 282, and therefore, denies the same.

283. Paragraph 283 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a

belief as to the truth of the allegations in Paragraph 283, and therefore, denies the same.

284. Paragraph 284 does not make allegations against Tyler Technologies and also states a legal conclusion; thus, no response is required. To the extent a response is required, Tyler Technologies denies the allegations in Paragraph 284.

285. Paragraph 285 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 285, and therefore, denies the same.

286. Paragraph 286 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 286, and therefore, denies the same.

287. Paragraph 287 does not make allegations against Tyler Technologies, and therefore, no response is

required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 287, and therefore, denies the same.

288. Paragraph 288 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 288, and therefore, denies the same.

289. Paragraph 289 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 289, and therefore, denies the same.

290. Paragraph 290 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies specifically denies that any defects existed in the eCourts system which caused or

contributed to any wrongful arrests. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the remaining allegations in Paragraph 290, and therefore, denies the same.

291. Paragraph 291 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 291, and therefore, denies the same.

292. Paragraph 292 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 292, and therefore, denies the same.

293. Paragraph 293 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a

belief as to the truth of the allegations in Paragraph 293, and therefore, denies the same.

294. Paragraph 294 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 294, and therefore, denies the same.

295. Paragraph 295 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 295, and therefore, denies the same.

296. Paragraph 296 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 296, and therefore, denies the same.

FIFTH CLAIM FOR RELIEF
(Action On Official Bond Against the Sheriff Defendants)

297. Tyler Technologies realleges its responses to the preceding paragraphs and incorporates them herein by reference.

298. Paragraph 298 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 298, and therefore, denies the same.

299. Paragraph 299 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 299, and therefore, denies the same.

300. Paragraph 300 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a

belief as to the truth of the allegations in Paragraph 300, and therefore, denies the same.

301. Paragraph 301 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 301, and therefore, denies the same.

302. Paragraph 302 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 302, and therefore, denies the same.

303. Paragraph 303 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 303, and therefore, denies the same.

304. Paragraph 304 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 304, and therefore, denies the same.

305. Paragraph 305 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 305, and therefore, denies the same.

306. Paragraph 306 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 306, and therefore, denies the same.

307. Paragraph 307 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler

Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 307, and therefore, denies the same.

IX. CLAIMS AGAINST CLERK DEFENDANTS

**SIXTH CLAIM FOR RELIEF
(False Imprisonment Against Clerk Defendants,
Individually)**

308. Tyler Technologies realleges its responses to the preceding paragraphs and incorporates them herein by reference.

309. Paragraph 309 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 309, and therefore, denies the same.

310. Paragraph 310 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 310, and therefore, denies the same.

311. Paragraph 311 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 311, and therefore, denies the same.

312. Paragraph 312 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 312, and therefore, denies the same.

313. Paragraph 313 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 313, and therefore, denies the same.

314. Paragraph 314 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler

Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 314, and therefore, denies the same.

315. Paragraph 315 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies specifically denies that the implementation of Odyssey in other states led to unlawful detentions and arrests. Tyler Technologies is without sufficient knowledge to form a belief as to the truth of the allegations in Paragraph 315 and therefore, denies the same.

316. Paragraph 316 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies specifically denies the allegations in Paragraph 316 that eCourts presented "similar defects." Tyler Technologies is without sufficient knowledge to form a belief as to the truth of the remaining allegations in Paragraph 316, and therefore, denies the same.

317. Paragraph 317 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies admits that Wake, Lee, Johnston, and Harnett Counties went live on eCourts before Mecklenburg County went live on eCourts. Tyler Technologies is without sufficient knowledge to form a belief as to the truth of the remaining allegations in Paragraph 317, and therefore, denies the same.

318. Paragraph 318 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 318, and therefore, denies the same.

319. Paragraph 319 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 319, and therefore, denies the same.

320. Paragraph 320 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 320, and therefore, denies the same.

321. Paragraph 321 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 321, and therefore, denies the same.

322. Paragraph 322 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 322, and therefore, denies the same.

323. Paragraph 323 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler

Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 323, and therefore, denies the same.

324. Paragraph 324 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 324, and therefore, denies the same.

X. INJUNCTIVE RELIEF CLAIMS

**SEVENTH CLAIM FOR RELIEF
(Injunctive Relief Against All Sheriff Defendants, All Clerk Defendants, Defendant Boyce and Defendant Fowler)**

325. Tyler Technologies realleges its responses to the preceding paragraphs and incorporates them herein by reference.

326. Admitted on information and belief that Ryan Boyce is the Executive Director of the NCAOC. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the remaining allegations in Paragraph 326, and therefore, denies the same.

327. Admitted on information and belief that Brad Fowler is employed by the NCAOC. Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the remaining allegations in Paragraph 327, and therefore, denies the same.

328. Paragraph 328 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies admits that Plaintiffs purport to bring certain legal claims. Except as expressly admitted herein, Tyler Technologies denies the allegations in Paragraph 328.

329. Paragraph 329 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies admits that Plaintiffs purport to bring certain legal claims. Except as expressly admitted herein, Tyler Technologies denies the allegations in Paragraph 329.

330. Paragraph 330 does not make allegations against Tyler Technologies, and therefore, no response is

required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 330, and therefore, denies the same.

331. Paragraph 331 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 331, and therefore, denies the same.

332. Paragraph 332 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 332, and therefore, denies the same.

333. Paragraph 333 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a

belief as to the truth of the allegations in Paragraph 333, and therefore, denies the same.

334. Paragraph 334 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 334, and therefore, denies the same.

335. Paragraph 335 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 335, and therefore, denies the same.

336. Paragraph 336 does not make allegations against Tyler Technologies, and therefore, no response is required. To the extent a response is required, Tyler Technologies is without knowledge sufficient to form a belief as to the truth of the allegations in Paragraph 336, and therefore, denies the same.

XI. PRAYER FOR RELIEF

Tyler Technologies denies that Plaintiffs, either individually or as part of a class, are entitled to any recovery or relief whatsoever. Tyler Technologies also denies that this action may proceed as a class action or that Plaintiffs are entitled to an order certifying a class. Tyler Technologies prays that the Complaint be dismissed with prejudice and the Plaintiffs take nothing.

XII. JURY DEMAND

Tyler Technologies also requests a jury trial.

XIII. REQUEST TO AMEND

Tyler Technologies denies that Plaintiffs are entitled to amend their Complaint.

AFFIRMATIVE DEFENSES

FIRST AFFIRMATIVE DEFENSE

1. Plaintiffs' claim against Tyler Technologies is barred, in whole or in part, because Plaintiffs fail to state a claim for which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

2. Plaintiffs' claim against Tyler Technologies is barred, in whole or in part, because Tyler Technologies did not owe any duty to Plaintiffs.

THIRD AFFIRMATIVE DEFENSE

3. Plaintiffs' claim against Tyler Technologies is barred, in whole or in part, because Tyler Technologies did not breach any alleged duty to Plaintiffs.

FOURTH AFFIRMATIVE DEFENSE

4. Plaintiffs' claim against Tyler Technologies is barred, in whole or in part, because Plaintiffs' alleged damages, if any, are speculative, uncertain, unreasonable, and/or incapable of being ascertained.

FIFTH AFFIRMATIVE DEFENSE

5. Plaintiffs' claim against Tyler Technologies is barred, in whole or in part, because Plaintiffs have not

suffered injury proximately caused by any conduct of Tyler Technologies.

SIXTH AFFIRMATIVE DEFENSE

6. Plaintiffs' claim against Tyler Technologies is barred, in whole or in part, because the intervening conduct of other actors breaks the sequence or causal connection between Tyler Technologies and any alleged harm to the Plaintiffs.

SEVENTH AFFIRMATIVE DEFENSE

7. Plaintiffs' claim against Tyler Technologies is barred, in whole or in part, because Plaintiffs' own negligence contributed to their injuries.

EIGHTH AFFIRMATIVE DEFENSE

8. Plaintiffs' claim against Tyler Technologies is barred, in whole or in part, because Plaintiffs' harm, if any, was caused by actors other than Tyler Technologies.

NINTH AFFIRMATIVE DEFENSE

9. Plaintiffs' claim against Tyler Technologies is barred by the public duty doctrine.

TENTH AFFIRMATIVE DEFENSE

10. Plaintiffs' claim against Tyler Technologies is barred by the Communications Decency Act, 47 U.S.C. § 230, *et seq.*

PRAYER FOR RELIEF

WHEREFORE, Tyler Technologies prays that the Court grant the following relief:

1. Find Plaintiffs are not entitled to any relief sought;
2. Enter judgment in favor of Tyler Technologies on all claims;
3. That the reasonable costs of this action be taxed against Plaintiffs; and
4. For such other and further relief as this Court deems just and proper.

Tyler requests a trial by jury.

This 28th day of April, 2025.

s/ Gregory L. Skidmore
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was electronically filed using the Court's e-filing system, which will automatically and electronically notify the following CM/ECF-registered counsel of record:

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This 28th day of April, 2025.

s/ Gregory L. Skidmore
Gregory L. Skidmore